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August 1, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*  
*E911 Quarterly Report – CC Docket No. 94-102*

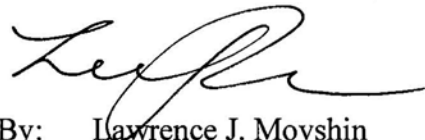
Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.<sup>1</sup>

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin  
Lee J. Rosen

Attachment

cc: Kris Monteith, Chief, Enforcement Bureau  
Catherine W. Seidel, Acting Chief, Wireless Telecommunications Bureau  
George Rice, Executive Director, APCO  
Rob Martin, Executive Director, NENA  
James R. Hobson, Counsel for NENA and NASNA  
Steve Marzolf, President, NASNA

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

## **E911 Status – Quarterly Report**

**CC Docket No. 94-102**

**August 1, 2006**

### **Summary of Report**

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,<sup>1</sup> Dobson Cellular Systems, Inc.,<sup>2</sup> as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

### **Phase I Service**

DCS has received numerous requests for Phase I services and has activated service in all but a few of these jurisdictions. Since the last quarterly filing, DCS has received new requests for Phase I service for eight PSAPs in the following counties: Davies, MO; Doniphan, KS, Elk, Indiana and Clearfield, PA; Mahoning, OH; and Woods and Cherokee, OK. DCS has worked diligently with its third-party vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. DCS remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in the remaining jurisdictions as soon as possible.

### **Phase II Service**

#### **A. Deployment Preparation**

DCS is a mid-sized carrier servicing predominantly rural and suburban markets in eleven states. DCS previously relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. DCS has worked with equipment vendors to deploy a network-based Phase II E911 solution, and all switch upgrades necessary to supply Phase II services have been completed. DCS has executed a contract with Andrew Corporation to provide the Position Determining Entity equipment for a hardware solution for E911 Phase II and has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II.

#### **B. Phase II Requests**

During the previous calendar quarter, DCS has deployed the necessary software and hardware of the network-based Phase II solution in response to pending requests. Since the last quarterly filing, DCS received new Phase II requests for nine PSAPs in the following counties:

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

<sup>2</sup> The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

Doniphan, KS; Gonzales, Jackson and Lavaca, TX; Crawford, Elk and Clearfield, PA; and Woods and Cherokee, OK. The status of all requests is detailed in the attachment. To ensure that it may properly prioritize its E911-designated resources, DCS has generally requested each of the requesting PSAPs to provide documentation pursuant to the *Richardson* criteria.<sup>3</sup>

On June 22, 2005, DCS completed the acquisition of licenses previously held by RFB Cellular, Inc. Debtor-in-Possession and Alpine-Michigan F, LLC Debtor-in-Possession (collectively “RFB”).<sup>4</sup> In the process, DCS became subject to various Phase II E911 deployment requests, all of which RFB had satisfied utilizing a CDMA handset-based technology. Dobson has completed a GSM overlay of the RFB network in areas not otherwise covered by Dobson’s previously-licensed spectrum, but this GSM network is operating through a different switch located in Grand Traverse, MI. The transition from CDMA to GSM/GPRS was completed in June, 2006. Dobson filed for waiver of the 20.18(g)(1)(v) of the Commission’s rules on December 20, 2005 because not all of the legacy CDMA customers have ALI-compliant handsets, and recently amended that waiver request to reflect the completed transition. The waiver request remains pending.

### **C. Deployment Issues**

DCS, as a rural carrier, continues to face unique deployment issues, all of which have been described in detail in previously filed quarterly reports.

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

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<sup>3</sup> *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

<sup>4</sup> In acquiring the RFB markets, DCS was not provided the specific dates of all previously received PSAP requests and, if applicable, E911 deployment dates. In the absence of having a specific date to insert into the report, DCS utilizes the placeholder date of 12/28/04 (the date DCS acquired the assets in RFB markets) to comply with formatting issues previously raised by the FCC staff.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
10	Anchorage Police Department	AK	Anchorage Borough	1	TDMA/GSM	04/28/2004		N	Y	08/17/2005			
10	Anchorage Police Department	AK	Anchorage Borough	2	TDMA/GSM	04/28/2004		N	Y	10/28/2005			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	1	TDMA/GSM	04/30/2001		N	Y	04/08/2002			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	2	TDMA/GSM	10/01/2004		N	Y	04/25/2005			
3459	Mason-oceana 9-1-1-Mason	MI	Mason	1	GSM	02/09/2001		N	Y	08/19/2002			
3459	Mason-Oceana 9-1-1-Mason	MI	Mason	2	GSM	1/9/03 and 9/30/2003		N	Y	04/19/2005			
3454	Manistee County Central Dispatch	MI	Manistee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	2	TDMA/GSM	07/21/2005		N	Y	09/15/2005			
3493	Montmorency County Sheriffs Department	MI	Montmorency	1	GSM	06/22/2005		N	Y	10/28/2005			Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3493	Montmorency County Sheriffs Department	MI	Montmorency	2	GSM	06/22/2005		N	Y	10/28/2005			
3518	Oscoda County Sheriffs Department	MI	Oscoda	1	GSM	06/22/2005		N	Y	12/14/2005			Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3518	Oscoda County Sheriffs Department	MI	Oscoda	2	GSM	06/22/2005		N	Y	12/14/2005			Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3517	Osceola County Sheriffs Office	MI	Osceola	1	TDMA/GSM	09/01/2000		N	Y	04/25/2002			
3517	Osceola County Sheriffs Office	MI	Osceola	2	TDMA/GSM	06/15/2004		N	Y	04/19/2005			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	2	TDMA/GSM	10/23/2003		N	Y	04/19/2005			
3316	Antrim County Central Dispatch	MI	Antrim	1	TDMA/GSM	09/11/2001		Y	Y	10/13/2003			
3316	Antrim County Central Dispatch	MI	Antrim	2	TDMA/GSM	12/20/2004		N	Y	04/27/2005			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	1	TDMA/GSM	09/01/2000		N	Y	04/08/2002			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/26/2005			
3442	Leelanau County Sheriffs Department	MI	Leelanau	1	TDMA/GSM	02/15/2001		N	Y	03/18/2002			
3442	Leelanau County Sheriffs Department	MI	Leelanau	2	TDMA/GSM	1/29/2004 and 6/15/04		N	Y	04/25/2005			
3587	Wexford County Central Dispatch	MI	Wexford	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3587	Wexford County Central Dispatch	MI	Wexford	2	TDMA/GSM	06/10/2005		N	Y	07/12/2005			
3346	CCE Central Dispatch-Emmet	MI	Emmet	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/27/2005			
3330	Benzie County Sheriffs Department	MI	Benzie	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3330	Benzie County Sheriffs Department	MI	Benzie	2	TDMA/GSM	03/17/2005		N	Y	04/25/2005			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	2	TDMA/GSM	06/06/2005		N	Y	07/22/2005			
3415	Huron County Central Dispatch	MI	Huron	1	TDMA/GSM	09/01/2000		N	Y	02/15/2002			
3415	Huron County Central Dispatch	MI	Huron	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			
3550	Sanilac County Central Dispatch	MI	Sanilac	1	TDMA/GSM	09/01/2000		N	Y	02/22/2002			
3550	Sanilac County Central Dispatch	MI	Sanilac	2	TDMA/GSM	11/03/2003		N	Y	04/27/2005			
3572	Tuscola County Central Dispatch	MI	Tuscola	1	TDMA/GSM	09/01/2000		N	Y	02/13/2002			
3572	Tuscola County Central Dispatch	MI	Tuscola	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	1	GSM	09/01/2000		N	Y	05/26/2004			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	2	GSM	12/03/2003		N	Y	04/27/2005			
3308	Alcona County Sheriffs Department	MI	Alcona	2	GSM	11/01/2003		N	Y	04/22/2005			
3317	Arenac County Central Dispatch	MI	Arenac	2	GSM	10/31/2003		N	Y	08/08/2005			
3354	Clare County Central Dispatch	MI	Clare	2	GSM	03/03/2004		N	Y	04/21/2005			
3361	Crawford Emergency Central Dispatch	MI	Crawford	2	GSM	10/23/2003		N	Y	04/27/2005			
3420	Iosco County 9-1-1	MI	Iosco	2	GSM	08/18/2003		N	Y	04/22/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3423	Isabella County Central Dispatch	MI	Isabella	2	GSM	04/21/2004		N	Y	04/20/2005			Although Dobson completed deployment of Phase II service. Dobson reverted back to Phase I per PSAP request.
3451	Mackinac County Sheriffs Department	MI	Mackinac	1	GSM	02/15/2001		N	Y	02/02/2005			
3451	Mackinac County Sheriffs Department	MI	Mackinac	2	GSM	02/03/2004		N	Y	04/27/2005			
3461	Meceola Central Dispatch-Mecosta	MI	Mecosta	2	GSM	04/01/2004		N	Y	04/20/2005			
3542	Roscommon County Central Dispatch	MI	Roscommon	2	GSM	10/28/2003		N	Y	04/21/2005			Although Dobson has completed deployment of Phase II service, on July 29, 2005, Dobson reverted back to Phase I per PSAP request. On May 31, 2006, Dobson returned to Phase II with PSAP consent.
3495	Muskegon Central Dispatch	MI	Muskegon	2	GSM	10/13/2004		N	Y	04/20/2005			
3504	Newaygo County 9-1-1 Central Dispatch	MI	Newaygo	2	GSM	10/21/2003		N	Y	04/19/2005			
3482	Midland County Central Dispatch	MI	Midland	1	GSM	08/16/2000		N	Y	05/26/2005			
3482	Midland County Central Dispatch	MI	Midland	2	GSM	01/27/2004		N	Y	06/15/2005			
3313	Alpena County Central Dispatch	MI	Alpena	1	GSM	11/16/2004		N	Y	01/12/2005			
3313	Alpena County Central Dispatch	MI	Alpena	2	GSM	11/09/2004		N	Y	04/26/2005			
3515	Ogemaw County Sheriffs Department	MI	Ogemaw	2	GSM	01/28/2004		N	Y	09/15/2005			
3519	Otsego County 9-1-1	MI	Otsego	2	GSM	11/21/2003		N	Y	04/26/2005			
3492	Montcalm County Central Dispatch	MI	Montcalm	2	GSM	11/05/2004		N	Y	04/20/2005			
3309	Alger County Central Dispatch	MI	Alger	1	GSM	01/25/2005		N	Y	09/22/2005			
3309	Alger County Central Dispatch	MI	Alger	2	GSM	01/25/2005		N	Y	09/22/2005			
3309	Alger County Central Dispatch	MI	Alger	2	CDMA	01/25/2005		N	Y	07/28/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	1	GSM	12/28/2004		N	Y	09/22/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	2	GSM	11/03/2003		N	Y	09/22/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	2	CDMA	11/03/2003		N	Y	09/16/2004			
3449	Luce County Sheriffs Department	MI	Luce	1	GSM	12/28/2004		N	Y	09/23/2005			
3449	Luce County Sheriffs Department	MI	Luce	2	GSM	12/30/2003		N	Y	09/23/2005			
3449	Luce County Sheriffs Department	MI	Luce	2	CDMA	12/30/2003		N	Y	09/16/2004			
3365	Delta County Central Dispatch	MI	Delta	1	GSM	12/28/2004		N	Y	09/22/2005			
3365	Delta County Central Dispatch	MI	Delta	2	GSM	01/20/2004		N	Y	09/22/2005			
3365	Delta County Central Dispatch	MI	Delta	2	CDMA	01/20/2004		N	Y	12/28/2004			
3552	Schoolcraft County	MI	Schoolcraft	1	GSM	12/28/2004		N	Y	09/23/2005			
3365	Schoolcraft County	MI	Schoolcraft	2	GSM	12/28/2004		N	Y	09/23/2005			
3365	Schoolcraft County	MI	Schoolcraft	2	CDMA	12/28/2004		N	Y	12/28/2004			
3531	Presque Isle Sheriffs Department	MI	Presque Isle	2	GSM	06/14/2005		N	Y	08/01/2005			
3397	Griatiot County Central Dispatch	MI	Griatiot	2	GSM	10/14/2005		N	Y	01/12/2006			
3763	Caldwell County Sheriffs Office	MO	Caldwell	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3763	Caldwell County Sheriffs Office	MO	Caldwell	2	TDMA/GSM	10/25/2004		N	Y	01/23/2006			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson has tested to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. The PSAP's CPE equipment initially did not function properly, but the PSAP fixed the problem allowing Dobson and the PSAP to finalize. However, due to the isolation of some of the cell sites from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network sometimes reverts back to Phase I
3785	Clinton County Sheriffs Office	MO	Clinton	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3785	Clinton County Sheriffs Office	MO	Clinton	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			
3795	De Kalb County Sheriffs Office	MO	De Kalb	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3795	De Kalb County Sheriffs Office	MO	De Kalb	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3860	Maryville Police Department	MO	Nodaway	1	TDMA/GSM	08/27/2003		N	Y	08/23/2004			
3860	Maryville Police Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	Y	03/28/2006			
3879	Nodaway County Sheriffs Department	MO	Nodaway	1	TDMA/GSM	01/21/2004		N	Y	08/23/2004			
3879	Nodaway County Sheriffs Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	Y	09/26/2005			
3769	Carroll County Sheriffs Office	MO	Carroll	1	TDMA/GSM	07/29/2004		N	Y	07/15/2005			
3769	Carroll County Sheriffs Office	MO	Carroll	2	TDMA/GSM	07/29/2004		N	Y	09/26/2005			
3811	Gentry County 9-1-1	MO	Gentry	1	TDMA/GSM	04/04/2005		N	Y	04/27/2006			Dobson did not receive the necessary LEC facilities until 4/27/06, and they were installed on same date.
3811	Gentry County 9-1-1	MO	Gentry	2	TDMA/GSM	02/02/2006		N	N		08/02/2006		
3742	Atchison County 9-1-1	MO	Atchison	1	TDMA/GSM	06/14/2005		N	Y	10/27/2005			
3794	Daviess County Central Communications	MO	Daviess	1	TDMA/GSM	05/11/2006		N	N		11/11/2006		
2707	Brown County Sheriffs Office	KS	Brown	1	TDMA/GSM	03/30/2005		N	Y	01/26/2006			
2725	Doniphan County Sheriff	KS	Doniphan	1	TDMA/GSM	06/21/2006		N	N		12/21/2006		
2725	Doniphan County Sheriff	KS	Doniphan	2	TDMA/GSM	06/21/2006		N	N		12/21/2006		
6423	Bastrop County Sheriffs Office	TX	Bastrop	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6467	Caldwell County Sheriffs Office	TX	Caldwell	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6578	Fayette County Sheriffs Office	TX	Fayette	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6725	Lee County Sheriffs Office	TX	Lee	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	2	TDMA/GSM	5/5/2006		N	N		11/05/2006		
6674	Jackson County Sheriffs Office	TX	Jackson	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6674	Jackson County Sheriffs Office	TX	Jackson	2	TDMA/GSM	5/5/2006		N	N		11/05/2006		
6722	Lavaca County Sheriffs Office	TX	Lavaca	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6722	Lavaca County Sheriffs Office	TX	Lavaca	2	TDMA/GSM	5/5/2006		N	N		11/05/2006		
6865	Rockdale Police Department	TX	Milam	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6627	Hamilton County Sheriffs Office	TX	Hamilton	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6575	Falls County Sheriffs Office	TX	Falls	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6587	Freestone Sheriffs Office	TX	Freestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6733	Limestone Sheriffs Office	TX	Limestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6446	Bosque County Sheriffs Office	TX	Bosque	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6649	Hill County Sheriffs Office	TX	Hill	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6498	Colorado County Sheriffs Office	TX	Colorado	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6592	Ft Bend County Sheriffs Office	TX	Fort Bend	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6757	Matagorda County Sheriffs Office	TX	Matagorda	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6993	Wharton County Sheriffs Office	TX	Wharton	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	2	TDMA/GSM	3/9/2005		N	Y	09/14/2005			
6572	Erath County Sheriffs Office	TX	Erath	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6572	Erath County Sheriffs Office	TX	Erath	2	TDMA/GSM	3/9/2005		N	Y	09/21/2005			
6411	Armstrong County Sheriffs Office	TX	Armstrong	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6476	Carson County Sheriffs Office	TX	Carson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6496	Collingsworth County Sheriffs Office	TX	Collingsworth	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6547	Donley County Sheriffs Office	TX	Donley	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6817	Pampa Police Department	TX	Gray	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6628	Hansford County Sheriffs Office	TX	Hansford	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6640	Hemphill County Sheriffs Office	TX	Hemphill	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6445	Borger Police Department	TX	Hutchinson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6735	Lipscomb County Sheriffs Office	TX	Lipscomb	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6827	Perryton Police Department	TX	Ochiltree	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6861	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6995	Wheeler County Sheriffs Office	TX	Wheeler	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6862	Robertson County Sheriff	TX	Robertson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6464	Burleson County Sheriffs Office	TX	Burleson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6726	Leon Sheriffs Office	TX	Leon	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6978	Washington County Sheriffs Department	TX	Washington	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6402	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Comanche County Sheriffs Office	TX	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sheriffs Office	TX	Runnels	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	Y	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/28/2003		N	Y	01/27/2005			
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N	Y	08/13/2003			
6641	Henderson County Sheriffs Department	TX	Henderson	2	TDMA/GSM	07/29/2003		N	Y	12/10/2004			
6911	Somervell County Sheriffs Department	TX	Somervell	2	TDMA/GSM	03/09/2005		N	Y	09/21/2005			
3205	Allegany County Emergency Services	MD	Allegany	1	TDMA	11/21/2003		N	Y	09/22/2004			
3205	Allegany County Emergency Services	MD	Allegany	1	GSM	11/21/2003		N	Y	06/21/2005			
3205	Allegany County Emergency Services	MD	Allegany	2	TDMA/GSM	10/18/2004		N	Y	07/26/2005			
3236	Washington County Fire Rescue and Communication	MD	Washington	1	TDMA/GSM	01/30/2004		N	Y	01/11/2005			
3236	Washington County Fire Rescue and Communication	MD	Washington	2	TDMA/GSM	02/07/2005		N	Y	07/13/2005			
3223	Garrett County Fire and Rescue Communications	MD	Garrett	1	TDMA/GSM	05/05/2004		N	Y	01/18/2005			
3223	Garrett County Fire and Rescue Communications	MD	Garrett	2	TDMA/GSM	01/21/2005		N	Y	06/29/2005			
3220	Frederick County Emergency Communications	MD	Frederick	1	TDMA/GSM	06/03/2004		N	Y	10/20/2005			
3220	Frederick County Emergency Communications	MD	Frederick	2	TDMA/GSM	06/15/2004		N	Y	10/20/2005			
5887	Erie County 9-1-1 Center	PA	Erie	1	TDMA/GSM	04/12/2001		N	Y	02/06/2002			
5887	Erie County 9-1-1 Center	PA	Erie	2	TDMA	04/12/2001		N	Y	10/30/2003			
5887	Erie County 9-1-1 Center	PA	Erie	2	GSM	04/12/2001		N	Y	09/07/2005			
5878	Crawford County Office of Emergency Services	PA	Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5878	Crawford County Office of Emergency Services	PA	Crawford	2	TDMA/GSM	05/03/2006		N	N		11/03/2006		
5893	Greene County 9-1-1	PA	Greene	1	TDMA/GSM	03/04/2006		N	N		09/04/2006		
5863	Cameron County Emergency Management Agency	PA	Cameron	1	TDMA/GSM	03/20/2006		N	N		09/20/2006		
5863	Cameron County Emergency Management Agency	PA	Cameron	2	TDMA/GSM	03/27/2006		N	N		09/27/2006		
5885	Elk County Communications	PA	Elk	1	TDMA/GSM	06/22/2006		N	N		12/22/2006		
5885	Elk County Communications	PA	Elk	2	TDMA/GSM	06/22/2006		N	N		12/22/2006		
5896	Indiana County Emergency Management Agency	PA	Indiana	1	TDMA/GSM	06/22/2006		N	N		12/22/2006		
5872	Clearfield County Communications	PA	Clearfield	1	TDMA/GSM	04/21/2006		N	N		10/21/2006		
5872	Clearfield County Communications	PA	Clearfield	2	TDMA/GSM	04/21/2006		N	N		10/21/2006		
5031	Allegany County Sheriffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Y	03/26/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	2	TDMA	06/13/2003		N	Y	04/01/2004			
5031	Allegany County Sheriffs Office	NY	Allegany	2	GSM	06/13/2003		N	Y	05/25/2005			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Y	08/06/2002			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA	06/05/2002		N	Y	04/15/2004			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	GSM	06/05/2002		N	Y	05/13/2005			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	1	TDMA/GSM	06/01/2001		N	Y	05/17/2002			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	TDMA	12/13/2002		N	Y	04/20/2004			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	GSM	12/13/2002		N	Y	05/12/2005			
5084	Genesee County Sheriffs Office	NY	Genesee	1	TDMA/GSM	04/10/2001		N	Y	11/21/2002			
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA	09/09/2002		N	Y	11/13/2003			
5084	Genesee County Sheriffs Office	NY	Genesee	2	GSM	09/09/2002		N	Y	05/25/2005			
5208	Steuben County Sheriffs Office	NY	Steuben	1	TDMA/GSM	11/03/2004		N	Y	10/26/2005			
5208	Steuben County Sheriffs Office	NY	Steuben	2	TDMA/GSM	11/03/2004		N	Y	10/26/2005			
5230	Wyoming County Sheriffs Office	NY	Wyoming	2	TDMA/GSM	03/31/2006		N	N		09/30/2006		
5644	Grady County Sheriffs Department	OK	Grady	1	TDMA/GSM	9/15/2004		N	Y	3/10/2005			
5644	Grady County Sheriffs Department	OK	Grady	2	TDMA/GSM	3/10/2005		N	Y	8/18/2005			
5644	Grady County Sheriffs Department	OK	Grady	2	TDMA/GSM	7/14/2006		N	Y	8/18/2005			
5728	Seminole Police Department	OK	Seminole	1	TDMA/GSM	2/20/2006		N	N		08/20/2006		
5728	Seminole Police Department	OK	Seminole	2	TDMA/GSM	2/20/2006		N	N		08/20/2006		
5590	Beckham County Sheriffs Office	OK	Beckham	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		PSAP originally notified Dobson that it was suspending work on Phase I and Phase II deployment until June 1, 2006. PSAP and Dobson have now mutually agreed to extend the implementation deadline for Phase I and Phase II deployment until November 1, 2006.
5590	Beckham County Sheriffs Office	OK	Beckham	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5612	City of Clinton Police Department	OK	Custer	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.

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5612	City of Clinton Police Department	OK	Custer	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5744	Weatherford Police Department	OK	Custer	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5744	Weatherford Police Department	OK	Custer	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5653	Hobart Police Department	OK	Kiowa	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5653	Hobart Police Department	OK	Kiowa	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5666	Kiowa County Sheriffs Department	OK	Kiowa	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5666	Kiowa County Sheriffs Department	OK	Kiowa	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5721	Roger Mills County Sheriffs Department	OK	Roger Mills	1	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5721	Roger Mills County Sheriffs Department	OK	Roger Mills	2	TDMA/GSM	3/1/2006		N	N		11/01/2006		See Beckham County (PSAP ID 5590), Phase I.
5608	Chickasha Police Department	OK	Grady	1	TDMA/GSM	3/9/2006		N	N		09/09/2006		
5608	Chickasha Police Department	OK	Grady	2	TDMA/GSM	3/9/2006		N	N		09/09/2006		
5704	Ottawa County 9-1-1	OK	Ottawa	1	TDMA/GSM	3/1/2006		N	N		09/01/2006		
5704	Ottawa County 9-1-1	OK	Ottawa	2	TDMA/GSM	3/1/2006		N	N		09/01/2006		
5581	Alva Police Department	OK	Woods	1	TDMA/GSM	5/15/2006		N	N		11/15/2006		
5581	Alva Police Department	OK	Woods	2	TDMA/GSM	5/15/2006		N	N		11/15/2006		
5604	Cherokee County 9-1-1	OK	Cherokee	1	TDMA/GSM	6/27/2006		N	N		12/27/2006		
5604	Cherokee County 9-1-1	OK	Cherokee	2	TDMA/GSM	6/27/2006		N	N		12/27/2006		
5527	Trumbull County Dispatch	OH	Trumbull	1	TDMA/GSM	4/24/2006		N	N		10/24/2006		
5307	Coshocton County Sheriffs Office	OH	Coshocton	1	TDMA/GSM	3/15/2006		N	N		09/15/2006		Dobson has only RF coverage (no physical sites) located within Coshocton County. Neighboring county with physical sites has not requested Phase I service, so Dobson is working with Coshocton PSAP to properly rout calls.
5405	Mahoning County E9-1-1	OH	Mahoning	1	TDMA/GSM	5/18/2006		N	N		11/18/2006		

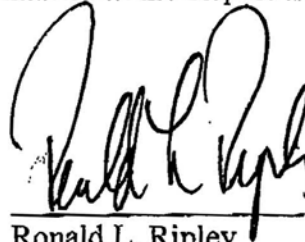


**AFFIDAVIT OF RONALD L. RIPLEY**

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley  
Senior Vice President &  
General Counsel

Executed on:

8-1-06

## **CERTIFICATE OF SERVICE**

I, LaVon E. Nickens, hereby certify that on the 1<sup>st</sup> day of August 2006, copies of the foregoing "E911 Quarterly Report" have been served by first class mail, postage prepaid to the following:

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/s/ LaVon E. Nickens  
LaVon E. Nickens

\* *via hand delivery*